

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

NATIONAL CHICKEN COUNCIL, *et al.*,

Plaintiffs,

v.

TOM VILSACK, in his official capacity as
SECRETARY OF AGRICULTURE, *et al.*,

Defendants.

No. 4:24-cv-03786

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' COMPLAINT**

Defendants Tom Vilsack, in his official capacity as Secretary of Agriculture, and Bruce Summers, in his official capacity as Administrator of the Agricultural Marketing Service, respectfully request a fourteen (14) day extension of time to respond to Plaintiffs' Complaint, ECF No. 1. Plaintiffs' Complaint was filed on October 4, 2024, served on the U.S. Attorney's Office on October 10, 2024, and Defendants' response is currently due on December 9, 2024. *See* Fed. R. Civ. P. 12(a)(2). With the requested extension, Defendants' deadline would be December 23, 2024. The parties are currently in discussions to propose a schedule for the efficient resolution of this case, but they require additional time to do so. Defendants have conferred with Plaintiffs as to this motion, and Plaintiffs consent to the extension of time.

Dated: November 27, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JOSEPH E. BORSON
Assistant Branch Director

/s/ Taylor Pitz

TAYLOR PITZ (CA Bar No. 332080)

Trial Attorney

U.S. Department of Justice

Civil Division, Federal Programs Branch

1100 L Street NW

Washington, DC 20005

Phone: (202) 305-5200

Email: Taylor.N.Pitz@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

On November 27, 2024, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Southern District of Texas, using the Court's electronic case filing system. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Taylor Pittz
TAYLOR PITZ
Trial Attorney
U.S. Department of Justice